

UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK

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STERLING NATIONAL BANK,

Plaintiff,

v.

CIVIL ACTION  
Case No.:07-CV-8709

COMPUTER SOLVERS, INC., JEROME N.  
GREENBERG, TERRI G. NOEL a/k/a  
TERRY LYNN GREENBERG a/k/a ,  
TERRY NOEL a/k/a TERRY L. GREENBERG,

Defendants.

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**INITIAL DISCLOSURES OF PLAINTIFF**

By way of initial disclosures ("Initial Disclosures") as required by F.R.C.P 26(a)(1), and reserving the right to revise, amend and/or supplement these disclosures as discovery and investigation in this matter is ongoing , and the provision of which does not constitute a waiver of any rights of plaintiffs to object to the admissibility or on any other basis to any Initial Disclosures, Plaintiffs represent as follows:

By providing these Initial Disclosures, Plaintiffs do not waive its right to object to discovery requests that are beyond the scope of permissible discovery under the Federal Rules of Civil Procedure and the Discovery Rules of this Court.

**A. Name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information:**

1. Benjamin Katz, Esq., Sterling Bank
2. Computer Solvers, Inc.: 5269 Greenwich Road; Suite 101, Virginia Beach, VA 23462 and c/o Jerome N. Greenberg, c/o Fresh Start, Inc., 232 Business Park Drive, Suite 202, Virginia Beach, Virginia 23462
3. Terri G. Noel a/k/a Terri Lynn Greenberg a/k/a Terri Noel a/k/a Terri L. Greenberg: 433 Caren Drive, Virginia Beach, VA 23452 and/or 4614 Guam Street, Virginia Beach, VA 23455
4. Jerome N. Greenberg: c/o Fresh Start, Inc., 232 Business Park Drive, Suite 202,

Virginia Beach, Virginia 23462

**B. A copy of, or description by category and location of all documents, data compilations, and tangible things that are that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment:**

1. All documents attached as exhibits to Plaintiff's Complaint.

**C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:**

Plaintiff's damages are the amount due and outstanding under a certain Security and Service Agreement dated October 8, 1999 (the "LSSA") entered into by Computer Solvers and the guarantees executed by the Guarantors. Plaintiff's damages are computed as follows: the principal amount of **\$456,249.01**, with interest continuing to accrue thereon from April 18, 2007 to the date of entry of judgment, plus attorneys' fees and expenses pursuant to the terms of the LSSA and guarantees, and the costs and disbursements of this action.

**D. For inspection and copying as under Rule 34, any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgement which may be entered in the action or to indemnify or reimburse for payment made to satisfy the judgement.**

No relevant insurance policy required to be disclosed pursuant to F.R.C.P 26 (a)(1)(D).

Dated: New York, New York  
March 14, 2008

Respectfully submitted,

/s/ Linda Gates  
Linda Gates (LG-4953)  
Platzer, Swergold, Karlin, Levine,  
Goldberg & Jaslow, LLP

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